



Ashford
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**Iowa College Student Aid
Commission (ICSAC) Requests for
Additional Information and Documentation**
November 12, 2012



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400 North Bluff Boulevard
Clinton, IA 52732

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INTRODUCTION

This document and related exhibits are presented in response to the letter from the Iowa College Student Aid Commission (ICSAC) dated September 22, 2012, in which Ashford University was asked to respond to several requests. The submission is organized to provide a readable, cross-referenced narrative response to each request, along with supporting documentation.

REQUEST 1:

Specific actions the University has taken to address the six areas of noncompliance that WASC described in its action letter dated July 3, 2012:

- ✓ Attrition, support for student achievement, and adequate levels of degree completion
- ✓ Alignment of resource allocations with educational purposes and objectives
- ✓ Adequacy of the Ashford faculty model and the role of faculty
- ✓ Effectiveness of program review
- ✓ Assessing student learning and assuring academic rigor
- ✓ Independence of the Ashford governing board

RESPONSE:

The University's response to this request is provided in **Table 1**. This table provides a concise list of the major changes instituted or areas strengthened since the University received the WASC action letter. It also outlines future plans and timelines due to be implemented by April 2013 and supporting documentation for University activities that are contained in documents provided earlier this year to The Higher Learning Commission (the HLC) and submitted herein to ICSAC. These activities are evidence of an institution focused on continuous improvement and on enhancing student success.

Evidence:

Table 1: Status of Ashford Initiatives—March 2012 to April 2013

Exhibit 1: Retention and Graduation Plan 2012–2015

Table 1: Status of Ashford University Initiatives—March 2012 to April 2013

March 2012 Status	Current Status—October 2012	Projected Status by April 2013	Supporting Details in HLC Documents
Attrition, support for student achievement, and adequate levels of degree completion			
<p>Publicly reported one-year retention data using IPEDS methodology as well as a modified version of IPEDS for all students.</p> <p>Reported these data based on a fall cohort model.</p>	<p>External reporting of retention trends using IPEDS and a full 12-month cohort methodology that includes all matriculated students, with a prominent link on the Ashford University website homepage http://www.ashford.edu/ under About University Data at http://assessment.ashford.edu/behind-numbers/institutional-data/cohort-retention-persistence-and-graduation</p> <p>Additionally, for internal purposes, the University is using specific course progression metrics, including two courses in 12 weeks, three courses in 19 weeks, and four courses in 26 weeks to allow identification of early indicators of success on various initiatives.</p>	<p>Completed and available on the Ashford University website homepage http://www.ashford.edu/ under About University Data at http://assessment.ashford.edu/behind-numbers/institutional-data/cohort-retention-persistence-and-graduation</p>	<p>HLC Criteria 1–3: pp. 45–48 and Figure 3</p>
<p>Data were analyzed to review characteristics of those students less likely to succeed.</p> <p>Data clearly indicate that the majority of attrition occurs during the first few courses after an online undergraduate student matriculates.</p> <p>Required students under the age of 22 to complete an extended application process for admission consideration.</p> <p>Student success data indicated continued high attrition for students under age 22.</p>	<p>Student success data indicated that online undergraduate students who do not perform well in their first course are unlikely to persist. Based on these data, the University implemented the “Ashford Promise,” a three-week conditional admission period for incoming online undergraduate and graduate students and, prior to matriculation and student accrual of charges, makes institutional admission decisions based on student performance.</p> <p>Changed admissions policy for students under age 22. As of October 24, 2012, students under 22 must have a conferred associate’s degree or be previously admitted under an approved exception and seeking readmission.</p>	<p>While sufficient time has not elapsed to fully impact Ashford’s one-year retention rates, 4 in 26 trend data are available to demonstrate progress.</p>	<p>HLC Criteria 1–3: p. 47—Internal Metrics “4 in 26” Cohort Performance Tracker</p> <p>HLC Criteria 1–3: pp. 49–50—Conditional Admission</p>

March 2012 Status	Current Status—October 2012	Projected Status by April 2013	Supporting Details in HLC Documents
Number of students with no transfer credits rose as enrollment grew over the past few years, while retention declined. Piloting the New Student Success Orientation (SSO) with low transfer credit students in one College.	Implemented SSO course for zero transfer credit bachelor's degree and all associate's degree students in all Colleges based on SSO pilot success data for zero-credit students.	Continue to analyze the impact.	HLC Criteria 1–3: pp. 49–50—Student Qualification, Student Success Orientation Course HLC Criteria 4 & 5: pp. 10–11—Student Success Orientation
Associate's students showed higher attrition than bachelor's students.	Discontinued enrollment in two low-retaining Associate of Arts programs in the College of Business and Professional Studies (10/2012) based on student success data and limited program value.	Continue to analyze the impact.	Not Applicable
Concern for high drop rates in initial courses resulted in a pilot study of smaller classes in which the amount of instructor time spent with each student and student activity in classroom and outcomes were tracked.	Transitioned six of eight General Education courses to small-class-size model based on success of one course pilot, which resulted in increased engagement, higher course grades, and decreased failure rate. All other courses are capped at 30 or fewer students.	Two remaining courses that will transition to smaller class size need additional faculty hired to support an increase in class sections. By March 2013, all eight courses will be transitioned from 60 students without a Teaching Assistant (TA) to 40 students with a TA.	HLC Criteria 1–3: p. 50—Student Support, Smaller Class Size
Began REAL Dashboard development to identify at-risk students in their first course.	REAL Dashboard, displaying student behavior related to course success, deployed to faculty and staff for coordinated interventions with at-risk students and demonstrated for the HLC Site Visit Team.	Continue to analyze the impact.	HLC Criteria 1–3: pp. 51–53— REAL Dashboard
One-year bachelor's-degree-seeking retention rate of 39% (students entering in 2010–2011, an annualized cohort)	Hired Director of Retention and Graduation. Established Student Retention and Graduation Plan. Reorganized Retention and Graduation Committee. Demonstrated the 4 in 26 Performance Tracker for the HLC Site Visit Team.	While sufficient time has not elapsed to fully impact Ashford's one-year retention rates, 4 in 26 trend data are available to demonstrate progress on initiatives.	HLC Criteria 1–3: pp. 47–48—Internal Metric—"4 in 26" Cohort Performance Tracker and p. 56—Ashford University Planning and Effectiveness department

March 2012 Status	Current Status–October 2012	Projected Status by April 2013	Supporting Details in HLC Documents
Alignment of resource allocations with educational purposes and objectives			
2200 Admissions Counselors 300 Student Advisors	Restructured Admissions department and reduced Admissions Counselors from ~2,200 to ~1,000. Student Advisors increased from ~300 to ~500, reducing the advisor-to-student ratio to ~200:1. Implemented InsideTrack coaching contract for added student support.	Further reduction of Admissions staff will have occurred through natural attrition. Current reorganization design is an Admissions staff of ~800. Based on the effectiveness of this additional student support, enroll additional students with InsideTrack or develop internal strategies to provide support.	HLC Criteria 1–3: pp. 105–107—Admissions
BPI consolidated financials indicated higher spending on marketing and recruitment over instructional spending. Ashford P&L was always subsumed in BPI P&L.	Reduced marketing costs by reducing the enrollment team. (See issue above.) Increased instructional spending by adding more faculty and student support staff. Revised P&L to separate Ashford financials from parent company.	Approved 2013 budget in revised P&L presentation will be available. Actual 2012 annual and 2013 first quarter (unaudited) financial information will be available. Projected financial information for 2013 and 2015 will be available.	HLC Criteria 1–3: pp. 36–37—Evidence of Continuing Financial Strength and Provision of Resources, p. 38—Investment in Full-Time Faculty Resources, pp. 39–40—Investment to Ensure Faculty Development, and pp. 41–42—Documentation of Organizational Commitment to Support and Strengthen Educational Quality and Reallocation of Operating Expenses HLC Minimum Expectations: p. 73—Instructional Costs and Services and Marketing and Promotional and p. 74—Past Practices and Restructured Approach
Adequacy of the Ashford faculty model and the role of faculty			
Total of 96 full-time faculty members. Faculty Assembly model for faculty governance was in place.	Increased and accelerated hiring of full-time faculty, for a total of 160 full-time faculty members. Full-time faculty actively involved in oversight of curriculum and associate (adjunct) faculty. Faculty leadership implemented an	Expectation is to have 218 total full-time online faculty members hired by April 2013. Ongoing recruitment to continue throughout 2013 for an expected total of 347 online full-time faculty members by the end of 2013.	HLC Criteria 1–3: pp. 17–21—Faculty Governance, pp. 38–40—Investment in Full-Time Faculty Resources, pp. 80–82—Oversight of Academic Programs: Curriculum and Development, and p. 88—Ashford’s Evolving Faculty Model HLC Minimum Expectations: p. 61 and

March 2012 Status	Current Status–October 2012	Projected Status by April 2013	Supporting Details in HLC Documents
	elected senate model, after a year of discussion and exploration. Standing committees are functioning.		p. 77—Addition of Full-Time Online Faculty
Academic leadership for online programs was transitioning from Clinton Campus to San Diego offices in preparation for WASC transition.	Hired an experienced President and an experienced Vice President for Planning and Effectiveness; created and staffed positions for the new department. Added an Executive Vice President of Academic Affairs, two Vice Provost roles, and ten Associate Dean positions (7 are currently filled).	Completed hiring for academic leadership roles.	HLC Criteria 1–3: p. 14—Mission-Driven Goal Setting, p. 56—Ashford University’s Planning and Effectiveness Unit, p. 82—Program Review, and pp. 84–86—Professional Development HLC Criteria 4 & 5: p. 4—Critical Thinking: An Essential Skill in a Life of Learning and Training and pp. 5–7 Development for Personal and Professional Growth
A Provost, four Executive Deans, and 50 full-time faculty provided academic oversight for online programs.	Ongoing professional development attendance for leadership team members includes the American Council on Education (ACE) Academy for New Provosts and Emerging Leaders in Online Education, with Penn State and Sloan-C among others. Working with consultants in specific areas such as critical thinking, program review, and assessment activities.	Continued focus on professional development.	HLC Minimum Expectations: pp. 28–29 (program review), pp. 30–32—Assessment Provides Evidence of Student Learning, p. 57—Faculty Forums, and p. 61—Institution Has a Sufficient Number of Faculty Members
Effectiveness of program review			
Five new program reviews had been completed for online. Previous program reviews had been completed for campus only.	Additional 15 program reviews, across Colleges, are underway at this time. Revised and improved the program review model based on work with consultant Dr. Linda Buckley, a WASC program review mentor. Increased the use of data in the program review process. Continue to use a minimum of two outside reviewers for each program.	Fifteen additional completed program reviews will be available for review. Five-year program review calendar for all programs will be available.	HLC Criteria 4 & 5: pp. 27–28—Program Review HLC Minimum Expectations: pp. 28–29—Program Review)

March 2012 Status	Current Status–October 2012	Projected Status by April 2013	Supporting Details in HLC Documents
	Program Review Dashboard established to provide program data needed for program reviews.		
Assessing student learning and assuring academic rigor			
<p>Assessment plans in place for all programs.</p> <p>Waypoint rubrics in some programs, with back-end reporting still in development.</p> <p>Numerous standardized tests used throughout the assessment process.</p>	<p>Use of learning outcomes assessment data for annual reviews and planning for each program is in process.</p> <p>Program and course-level reviews continue using various tools to assess critical thinking elements, credit hour, and level of Bloom’s taxonomy in demonstrating learning outcomes.</p>	<p>Completed annual academic reviews of Program Assessment Maps for the 2011–2012 year, with action plans, will be available.</p> <p>Evidence of reviews will be available.</p>	<p>HLC Criteria 1–3: pp. 63–71—(Core Component 3a) and pp. 93–101—Ensuring Rigor in the Classroom</p>
<p>Instructional Specialists and full-time faculty monitor classroom rigor.</p>	<p>Faculty peer review and professional development fully implemented across all Colleges, with an emphasis on effective use of feedback and critical thinking.</p> <p>Additional remote full-time online faculty members will assist with peer reviews and peer mentoring.</p> <p>Forty remote full-time online faculty members started at Ashford on 10/22/2012. Faculty roster provided.</p>	<p>Additional professional development sessions will be in place.</p> <p>Schedule for ongoing peer reviews and mentoring of faculty will be established.</p> <p>Additional 226 remote full-time online faculty members will be hired during the next 18 months to assist with instruction, curriculum and assessment, peer review, peer mentoring, and course oversight.</p>	<p>HLC Criteria 1–3: pp. 39–40—Investment to Ensure Faculty Development, pp. 82–83—Faculty Support and Development, and Tables 4 & 5</p> <p>HLC Criteria 4 & 5: pp. 5–10—Training and Development</p> <p>HLC Minimum Expectations: pp. 52–53—Faculty Peer Review and Mentoring and pp. 55–59—Training and Professional Development</p>
Independence of the Ashford governing board			
<p>Shared services with BPI handled via informal policy.</p>	<p>Implemented formal, Board-approved Shared Services Agreement.</p>	<p>Formal process for evaluating cost and quality of services provided under Shared Services Agreement will be instituted.</p>	<p>HLC Minimum Expectations: p.6—Autonomy of the Governing Board, pp.12–13, Exhibit 24—Ashford–Bridgepoint Shared Services Agreement, and pp. 75–76—Service Agreement with the Parent Company</p>
<p>Sixth Amended Operating Agreement not yet implemented.</p>	<p>Implemented Board-approved Sixth Amended Operating Agreement.</p>	<p>Board membership will be increased by at least four new members.</p>	<p>HLC Criteria 1–3: pp. 16–17—Oversight by the Board of Trustees, p. 23—WASC Comment Regarding Autonomy of the</p>

March 2012 Status	Current Status–October 2012	Projected Status by April 2013	Supporting Details in HLC Documents
Numerous dotted-line reporting relationships between Ashford staff and BPI.	<p>Majority of Trustees must be independent.</p> <p>Identifying new Board members.</p> <p>Formed a National External Advisory Committee—has met with University leadership five times since its formation in August 2012.</p> <p>Board appointed new President.</p> <p>In discussions with the Association of Governing Boards (AGB) of Universities and Colleges; a two-year consulting relationship is to be developed.</p>	<p>A Transitional Council to advise the new leadership will replace the National External Advisory Committee.</p> <p>Association of Governing Boards (AGB) consulting contract will be active.</p>	<p>Governing Board, and p. 38—Evidence of Continuing Financial Strength and Provision of Resources and Operating Expenses and Scholarships</p> <p>HLC Minimum Expectations: p. 6—Autonomy of the Governing Board, Exhibit 9 and 10—Sixth Amended and Restated Operating Agreement and Sixth Amended Board Policy Manual, and p. 75—Personnel Reorganization</p>
Consolidated budgeting and financial functions at BPI.	<p>Budgeting process has undergone substantial revision to separate it from BPI.</p> <p>Separate Ashford financial audit conducted by PricewaterhouseCoopers, LLP.</p>	<p>Budget calendar will be revised to improve alignment between planning and budgeting functions.</p> <p>Financial presentation will be revisited to achieve greater comparability with other educational institutions.</p> <p>Finance team will be developed further to achieve increased depth and breadth of financial analysis.</p> <p>Annual financial audits will continue to be conducted for the University.</p>	<p>HLC Criteria 1–3: p. 23—Budgeting and Auditing Process and pp. 36–37—Evidence of Continuing Financial Strength and Provision of Resources and Operating Expenses and Scholarships</p> <p>HLC Minimum Expectations: p. 74—Past Practices and Restructured Approach</p>

REQUEST 2:

A copy of the reports the University provided to The Higher Learning Commission (the HLC) demonstrating its compliance with the HLC's Criteria for Accreditation and Core Components on August 31, 2012, and September 21, 2012.

RESPONSE:

The requested reports and supporting documentation submitted to the HLC are provided as evidence.

Evidence:

- **Exhibit 2:** HLC Special Monitoring Report: Criteria One, Two, and Three and Core Components
- **Exhibit 3:** HLC Special Monitoring Report: Criteria Four and Five and Core Components
- **Exhibit 4:** Minimum Expectations Within the HLC Criteria for Accreditation

REQUEST 3:

The University's plan to demonstrate compliance with the HLC's policy on substantial presence in the HLC region in the event that migration to WASC does not occur or is significantly delayed.

RESPONSE:

In its letter to Ashford University dated July 27, 2012, the HLC requested that Ashford University provide, not later than December 1, 2012, a plan for compliance with its Substantial Presence Policy. Should Ashford either withdraw from the WASC process, fail to achieve initial accreditation from WASC in July 2013, or be subject to a substantial delay in its migration to WASC, the HLC clarified that it would expect the University to come into compliance with the HLC Substantial Presence Policy by implementing its Plan.

Since July 2012, Ashford University has been working closely with WASC and the HLC to ensure that the University maintains compliance with all the HLC Policies and Criteria for Accreditation while undergoing reapplication for initial accreditation with WASC. Ashford leaders have visited the HLC offices to gain clear interpretation of the HLC's expectations with regard to the operational meaning of substantial presence, have been in email dialogue with Andrew Lootens-White and Karen Solinski of the HLC, and are in the process of providing to the HLC a draft version of the University's Substantial Presence Plan for comment prior to final submission. Ashford will then incorporate the HLC's suggestions and comments into its finalized plan. Ashford may supply ICSAC with a copy of the Ashford University Substantial Presence Plan once it has been considered and approved by the HLC.

Should Ashford withdraw from the WASC process, fail to achieve initial accreditation from WASC in July 2013, or be subject to a substantial delay in its migration to WASC, the University will have developed its plan in sufficient operational and financial detail to be able to implement the plan within a reasonable period of time to ensure continuing compliance with the HLC Substantial Presence Policy.

REQUEST 4:

Per Iowa Administrative Code Section 283-21.2(261B), subsection 13, the University's *specific plan* to implement “alternatives for students to complete their programs at the same or other institutions if the applicant school closes the program before the students have completed their courses of study.” The Commission requests that the University have a teach-out plan in place in the event, however unlikely, that it must close its programs because it is unsuccessful in obtaining WASC accreditation and is sanctioned by the HLC.

RESPONSE:

Ashford University fully intends to comply with administrative rule 283-21.2(261B). This rule requires Ashford University to supply a statement, signed by the chief executive officer, demonstrating Ashford’s commitment to the delivery of programs located in Iowa and agreeing to provide alternatives for students to complete their programs at the same or other institutions if Ashford should close before students were able to complete their courses of study. As required by the Iowa College Student Aid Commission under 283-21.2(261B) approval criteria, Ashford has previously supplied the required signed statement.

At this time, Ashford is not required by statute or by the HLC accreditation criteria to offer a specific teach-out plan. If the situation arose where Ashford would be required to implement such a plan, the University remains committed to providing a plan that meets Iowa law and would supply the plan to its students in a timely fashion to allow them to make informed decisions and take advantage of available alternatives. Ashford University remains fully accredited by The Higher Learning Commission of the North Central Association. The relevant HLC Policy 3.9(a) requires a teach-out plan in only four circumstances, none of which is currently the case. No teach-out plan is scheduled at this time, as Ashford is in full compliance with the HLC standards. If the HLC requires a teach-out plan from Ashford at any time, it will be shared with ICSAC. If Ashford’s understanding of this request is not in alignment with that of the Commission, further clarification and guidance is requested as to specific elements of information that are being requested by the Commission and the basis for an extended request.

REQUEST 5: The University's admission/enrollment/recruitment counselors/advisors handbook or other written procedures for these University employees, written job performance standards for admission/enrollment/recruitment counselors/advisors, current training presentations developed for admission/enrollment/recruitment counselors/advisors and written scripts provided to these employees.

RESPONSE:

Written policies and procedures are contained in the *Bridgepoint Education Employee Handbook*, which provide guidance for all Ashford University employees. Ashford University does not publish a handbook specific to its admission/enrollment/recruitment counselors/advisors. Ashford University written job performance standards for Admissions Counselors are outlined in the official job descriptions for each position and in the Admissions Counselor Minimum Performance Expectations document. Competency review standards are also outlined in the Admissions Counselor Competency Review presentation, which outlines the criteria for annual salary adjustments for Admissions Counselors. These documents are provided as evidence, along with current training materials, including conversation guides.

Evidence:

- **Exhibit 5:** *Bridgepoint Education Employee Handbook*
- **Exhibit 6:** Admissions Job Descriptions
- **Exhibit 7:** Admissions Counselor Competency Review Presentation
- **Exhibit 8:** Admissions Counselor Minimum Performance Expectations
- **Exhibit 9:** Admissions Counselor training materials, including conversation guides

REQUEST 6:

The University's plan to, generally, ensure that a student who requests financial aid as a payment option receives his or her financial aid award letter before the student is expected to begin attendance in a class for which the student will be charged.

RESPONSE:

The current state, as well as the future plan and timeline related to the timing of financial aid information and award letters for students, are shown below. Evidence of these actions and references are also provided.

Current State:

Students identify their preferred payment option during the admissions application process. Students also receive a Financial Services Welcome Call from a Financial Services Advisor to review their payment option requirements. If students select financial aid, they are required to complete core documents (Free Application for Federal Student Aid, Master Promissory Note, Ashford Institutional Financial Aid Application, and Entrance Loan Counseling form). A student is advised, in the Financial Services Welcome Call, through a series of automatically generated emails and in the *Ashford University Academic Catalog* that the required core financial aid documents are expected to be submitted prior to the student's course start date, but are due by the end of the first week of his or her first course with the University.

If the core documents are not completed properly and submitted before the due date, the student is removed from his or her scheduled course and is not permitted to restart until all core documents are received. Students who are removed from class due to missing core documents are not charged for the course or for any materials. The student is required to work with his or her Admissions Counselor to determine a new start date. During the Financial Services Welcome Call, in the Financial Services Webinar, and through automatically generated emails, the student is told to expect that it will be approximately 8 weeks after the start date or 8 weeks after all completed financial aid documents are on file, whichever comes later, for his or her eligibility to be determined.

Generally, students who are not selected for verification receive an award letter within the first five weeks, and students who are selected for verification receive an award letter within approximately 8 weeks. This award letter includes details of the student's estimated awarded amount of federal student aid for which he or she is eligible, along with tentative disbursement dates.

Future Plan and Timeline:

A project is currently in progress to initiate changes in the timing and content of the award letter. The University is in Phase 2 of this project, which focuses on full implementation of the Shopping Sheet guidance for providing students with particular information prior to enrollment for the 2013–14 award year (as required in Executive Order 13607) and automated packaging of

the student upon receipt of the Institutional Student Information Record (ISIR). Although implementation of the Shopping Sheet is only required for military students, Ashford intends to implement it for the benefit of all students as a matter of best practice. The automated packaging process will allow Ashford to leverage its Student Information System to automatically award students using packaging groups. Ashford will also package students upon receipt of the ISIR and place appropriate holds on students needing verification or other supporting documents, rather than requiring the supporting documents prior to packaging. Students will be informed that their awards are based upon current information and may change due to receipt of updated information. In addition, for students starting on or after November 13, 2012, the University implemented the “Ashford Promise,” a conditional admission policy whereby all qualified students will be afforded a three (3) week trial period during which they will incur no financial liability unless they are admitted, matriculate, and attend beyond the third week of their first course. These changes will help facilitate the University’s ability to provide the student with an award letter prior to the student incurring any financial obligation.

Evidence:

- **Exhibit 10:** Financial Services Welcome Call Script
- **Exhibit 11:** Financial Aid Plan Excerpt, *Ashford University Academic Catalog 2012–2013*
- **Exhibit 12:** Ashford Promise Excerpt, 2012-2013 *Ashford University Academic Catalog Supplement*
- **Exhibit 13:** Loan Disbursement Excerpt, 2012-2013 *Ashford University Academic Catalog Supplement*

References:

- [NASFAA Award Notifications and Related Consumer Information Webinar Handout](#)
- [Executive Order 13607](#)
- [Final Annotated Shopping Sheet](#)
- [DCL ID: GEN-12-10](#)
- [Principles of Excellence—Final Q&A](#)
- [DCL ID: GEN-12-12](#)
- [DCL ID: GEN-12-17](#)
- [Electronic Announcement, September 11, 2012](#)
- [Electronic Announcement, September 28, 2012](#)

REQUEST 7:

The Commission requests that the University revise its award letter to include additional information about the total cost of attendance and the various components that comprise the cost of attendance figure used to determine the student's eligibility for federal student aid, the total award-year or academic-year amounts of grant or loan aid that have been awarded to the student, and any remaining unmet need that results.

RESPONSE:

The current state and future plans and timelines relative to revision of the award letter are shown below. Evidence of these actions and references is also provided.

Current State:

In its current state, the Ashford University award letter contains awarded amounts and scheduled disbursement dates, as well as all disclosures required by Federal financial aid regulations. The University is currently providing cost of attendance information on the www.Ashford.edu website (http://www.ashford.edu/admissions/online_tuition_fees.htm), through the *Ashford University Academic Catalog 2012-2013*, and through a link within the award letter. Updates were made to the current award letter in July 2012, which included the following:

- Referred student to direct and indirect costs on the University website.
- Identified typical revision scenarios.
- Removed: "Please note that the following award may be subject to change at the discretion of the Financial Aid Office," and added "Please note that the following awards are only estimates and may be subject to change if you experience any changes in your schedule, including dropped or non-passed courses. It is your responsibility to maintain good academic standing to remain eligible for the financial aid in which you have been scheduled."
- Added explanation: "Note: In order to become eligible for your second payment period, you must satisfy half the number of credits and instructional weeks in your Academic Year."
- Added inferred acceptance of loans statement.
- Referred student to Financial Aid Office for any desired changes to award or authorization.
- [Added Financial Aid TV link.](#)
- Added reference to the National Student Loan Data System (NSLDS) website for individual monitoring.

Future Plan and Timeline:

A project is currently in progress to initiate changes to the timing and content of the award letter. Ashford is in phase two of this project, which focuses on implementation of the Shopping Sheet guidance for the 2013–14 award year (as required in Executive Order 13607), system

automation, and packaging the student upon receipt of the Institutional Student Information Record (ISIR). The University will provide students the information suggested by the Commission and will use the Department of Education Shopping Sheet template as added guidance, which includes cost of attendance, any grants and scholarships awarded, net costs, loan options, estimated family contribution, graduation rates, loan default rates, median borrowing, and information on loan repayment.

Evidence:

- **Exhibit 14:** Federal Direct Annual Loan Limit Excerpt, Ashford University Academic Catalog 2012–2013
- Cost of Attendance http://www.ashford.edu/admissions/online_tuition_fees.htm
- **Exhibit 15:** Ashford University Award Letter

References:

- [NASFAA Award Notifications and Related Consumer Information Webinar Handout](#)
- [Executive Order 13607](#)
- [Final Annotated Shopping Sheet](#)
- [DCL ID: GEN-12-10](#)
- [Principles of Excellence—Final Q&A](#)
- [DCL ID: GEN-12-12](#)
- [DCL ID: GEN-12-17](#)
- [Electronic Announcement, September 11, 2012](#)
- [Electronic Announcement, September 28, 2012](#)

REQUEST 8:

The Commission requests that the University adopt an active confirmation process for federal student loans, including a statement on the award letter advising the student that he/she may request an amount of loan funds that is less than the awarded amount and, in each case, providing the student with the opportunity to request a lesser loan amount, and requiring the student to actively accept the original or lesser student-requested loan award amount.

RESPONSE:

The current state and future plans relative to an active confirmation process for federal student loans are shown below. Evidence of these actions is also provided.

Current State:

A process is in place whereby the student is given the opportunity to request an amount lesser than the annual federal loan limits on his or her Institutional Financial Aid Application. This opportunity is presented to the student as part of the financial aid process, rather than after the financial aid is awarded. The student is counseled during the Financial Services Welcome Call on his or her maximum loan availability but is encouraged to request loans only for his or her institutional charges and fees.

The University also includes a statement on the award letter advising the student that he or she may request a dollar amount of loan funds that is less than the awarded amount. The award letter contains the following language: “If you accept the financial aid package as offered, no further action is required on your part. If you choose to decline or reduce any offered award(s), please contact us at 866.487.9747 or email financialaid@ashford.edu. Unless you notify the Financial Aid Office prior to your estimated disbursement date, your loans will not be cancelled.” The student is given another opportunity to cancel his or her loans shortly after the loan is disbursed. The student is reminded of this fact when he or she views the disbursement receipt located in the Student Portal and sees the following message: “You have the right to cancel all or a portion of your loan or this disbursement and have the proceeds returned to your lender within 30 days of this notice. In order to cancel all or part of your loan, you must notify your Financial Services Advisor, in writing, of your cancellation request and amount.”

Future Plan and Timeline:

During the 2013/2014 award year, the University will initiate the improvements to the award letter discussed earlier in this document. These initiatives will serve to improve both the timing and the breadth of information contained in the award letter. A process for requiring the student to actively accept the original or lesser student-requested loan award amount will also be considered within the context of the project described earlier.

Evidence:

- **Exhibit 10:** Financial Services Welcome Call Script
- **Exhibit 15:** Ashford University Award Letter

- **Exhibit 16:** Disbursement Receipt E-Mail

REQUEST 9:

The University's current process for making books available to all students who are scheduled to begin attendance in a payment period before federal student aid funds are disbursed.

RESPONSE:***Current State:***

The University has processes in place to ensure that all undergraduate and graduate students start a program with books and materials. Undergraduate- and graduate-degree-seeking students are provided a waiver for the Course Digital Materials (CDM) fee for their first course. This waiver ensures that new undergraduate students, regardless of Pell eligibility, receive books and materials related to the first course prior to the start date. The majority of undergraduate and graduate courses use CDM (Course Digital Materials), which are made available to students five days prior to the start of all courses, regardless of payment option.

Pell-eligible undergraduate students who meet the requirements outlined in 34CFR§668.164(i) and are not entering into a course with available CDM are provided with a voucher to purchase their required books and supplies through the University's online bookstore. The voucher is emailed to eligible students within the first seven days of the financial aid payment period.

Future Plan and Timeline:

The initiatives outlined in previous sections to improve the timing of award letters and the information contained in the award letters should also serve to further enhance this service to students. The University will periodically review its procedures to ensure that all eligible students are consistently served through the voucher process.

Evidence:

- **Exhibit 17:** Book Voucher Excerpt, *Ashford University Academic Catalog 2012–2013*
- **Exhibit 18:** Course Digital Materials System Excerpt, *Ashford University Academic Catalog 2012–2013*

Reference:

Department of Education Code of Federal Regulations, 34CFR§668.164(i)

REQUEST 10:

An illustration (facsimile and screenshot) of the online and other documentation the University presents a student to request the student's authorization to hold a credit balance.

RESPONSE:

The current state and future plans relative to this documentation are shown below. Evidence and references are also provided.

Current State:

Students are given the opportunity to provide such authorization or to decline such authorization on the Student Account Authorization Form that is available during the Financial Aid application process as well as on a PDF version of this form that is available on the online Student Portal. However, this document is not required. A student may voluntarily authorize the University to hold and manage his or her federal student aid credit balance and deliver the credit balance to him or her, in increments, throughout the payment period.

Future Plan and Timeline:

The student communication plan relative to management of authorizations and credit balances is being reviewed with Carolyn Small, Postsecondary Registration Administrator, for potential improvement points.

Evidence:

- **Exhibit 19:** Student Account Authorization Form
- **Exhibit 20:** Screenshot: Online Student Account Authorization Form presented during the financial aid application process

References:

- Department of Education Code of Federal Regulations, 34CFR§668.164(e)
- Department of Education Code of Federal Regulations, 34CFR§668.165(b)(1)(iii)

REQUEST 11:

The University's procedures for identifying students who have not executed an authorization.

RESPONSE:

University procedures for identifying both students who have not executed an authorization and students who have withdrawn an authorization are outlined below.

Current State:

The student's authorization decision is documented within the institution's system of record. Students who have not executed or have specifically indicated they do not authorize the University to retain their credit balance will have their full credit balance released within 14 calendar days in accordance with 34CFR§668.164(e). Only students who have voluntarily authorized the University through the Student Account Authorization Form will have their credit balance released in increments. At the time of disbursement, the student account is reviewed by the University, and any available credit balance is scheduled to be released according to the student's authorization.

Any student who has previously provided authorization for the University to retain funds may withdraw his or her authorization at any time by submitting an email to revocations@ashford.edu or mailing the request to the address on the Student Account Authorization Form. Students are made aware of this procedure on the Student Account Authorization Form itself. Once the request is received, the system information of record is updated, and the University will review the student account to determine if a future scheduled credit balance needs to be released to the student. This process is completed within the timeframes required by federal regulations.

Future Plan and Timeline:

The current processes will remain implemented. The University will periodically review its procedures to ensure that all students are consistently served through this process.

Evidence:

- **Exhibit 19:** Student Account Authorization Form
- **Exhibit 21:** Screenshot: Student Information System (CampusVue) Document Tracking

References:

- Department of Education Code of Federal Regulations, 34CFR§668.164(e)
- Department of Education Code of Federal Regulations, 34CFR§668.165(b)(1)(iii)

REQUEST 12:

The University's procedures for processing 1) credit balance payments, 2) authorized stipend payments, and 3) credit balance authorization revocations, including the role of its third-party contractor Sallie Mae and Sallie Mae staff in these processes.

RESPONSE:

University procedures for all three areas requested are outlined below. Evidence and references are also provided.

Current State:***Authorization Decision:***

The student's authorization decision is documented via the Student Account Authorization Form (SAAF) within CampusVue. Only students who have voluntarily authorized the University through the SAAF will have their credit balance released in increments. Students who have not provided a fully executed SAAF or students who have specifically indicated they do not authorize the University to retain credit balances will have any credit balance released within 14 calendar days in accordance with 34CFR§668.164(e). At the time of financial aid disbursement, the student account is reviewed by the University's Student Accounts team and any available credit balance is scheduled to be released according to the student's authorization decision.

Any student who has previously provided authorization for the University to deliver his or her credit balance in increments may withdraw this authorization at any time by submitting an email to revocations@ashford.edu or mailing the request to the address on the SAAF. Students are made aware of this procedure on the SAAF. Once the request is received by the University, the Student Information System (CampusVue) is updated, and the Student Accounts team determines if a future scheduled credit balance needs to be released to the student. This process is completed within the timeframes required by 34CFR§668.165(b)(4)(iii).

Calculating and Approving Stipend Amounts:

The University's Student Accounts team is responsible for scheduling the credit balance due to the student pursuant to 34CFR§668.164(e). Student Accounts personnel receive significant hands-on training in relevant federal regulations. Student Accounts utilizes the student's authorization decision and CampusVue to determine the credit balance available. Once the amount due to the student is reviewed and approved by Student Accounts, the approved data file is provided to Sallie Mae, the third-party servicer used to deliver credit balance stipends, via secure data file transfer.

Sallie Mae:

Sallie Mae delivers credit balance payments to students via paper check or electronic funds transfer (EFT) to a bank account specified by the student. Any student who does not authorize direct deposit has his or her credit balance payment issued to him or her automatically via paper

check. Should an EFT fail, a paper check is issued to the student as soon as the receiving bank notifies Sallie Mae of the failure and returns the funds.

Upon final approval by the University, Sallie Mae loads the data file and queues the records to be released. After sending the credit balance data file, the University works closely with Sallie Mae to confirm receipt of the information and to ensure that Sallie Mae has imported all records in the data file. The University logs in to the Sallie Mae system to verify the batch record count and payment totals match what was sent for processing. In the case of a discrepancy in the totals, a student-by-student reconciliation is completed. Once the University has verified the student balances to be processed, the University provides Sallie Mae with final approval to release the funds to the student.

Future Plan and Timeline:

The University is currently working with Sallie Mae to improve the student experience by aligning student communication terminology to reduce potential student confusion during the credit balance delivery process.

Evidence:

- **Exhibit 19:** Student Account Authorization Form

References:

- Department of Education Code of Federal Regulations, 34CFR§668.164(e)
- Department of Education Code of Federal Regulations, 34CFR§668.165(b)(1)(iii)

REQUEST 13:

The Commission requests the University's procedures for auditing its contractor to ensure compliance with federal student aid cash management rules.

RESPONSE:

Audit procedures to ensure compliance with federal student aid cash management rules are provided below.

Current State:

The University is responsible for the delivery of credit balances to students and has implemented a process that includes weekly quality assurance testing, verification of records Sallie Mae has queued for release, and final batch approval.

The University undergoes an annual Federal Student Assistance Audit conducted by an independent auditing firm.

Sallie Mae Campus Solutions undergoes an annual SOC 1 audit by its independent auditing firm and has had a clean audit opinion to date. The University receives these audit reports (SSAE16) in a timely fashion and performs a thorough review to ensure compliance with Title IV regulations and the internal control requirements of Sarbanes-Oxley.

Future Plan and Timeline:

The current process will remain in place and any findings discovered through this process will be remediated.

REQUEST 14:

The University's plan to improve student access to and the quality and consistency of academic and financial support and advisement services to students.

RESPONSE:

Since the inception of Ashford's online modality, students have been supported by specifically assigned advisors dedicated to assisting them in navigating through their educational experience at the University. However, as a result of our commitment to continuous improvement and in response to survey data paired with informal student feedback, the University recently blended the formerly stand-alone Academic Advisor and Financial Services Advisor roles into a single point of contact, termed Student Advisor. This student support model was implemented University-wide in January 2012 and is intended to streamline and enhance the student experience. The University continues to monitor and evaluate the evolved student support model, using these information and data, in turn driving additional refinements as needed.

As was the case with previous support roles (e.g., Academic Advisor), Student Advisors are assigned to specific student populations. However, this shift has allowed the University to lower the student-to-advisor ratio, enabling advisors to spend more time with each student. The student- to-advisor ratio was further refined during the second half of 2012 with a reduction in Admissions staff and an increase in student advising staff. Combining academic and financial advisement eliminates the need to transfer students between the two departments. Furthermore, lowering the advisor-to-student ratio accelerates the response to student calls, emails, and requests for information. Additionally, Student Advisors are responsible for advising holistically, ensuring that students are well informed and well supported throughout the student life cycle with regard to both their academic progress and their financial requirements. This holistic advising process allows for an opportunity to deepen the advising relationship with students throughout their time at Ashford.

Coinciding with the student support model change, Student Advisors were also aligned to academic program families to deepen their level of programmatic knowledge and curriculum-progression-related advising. Beginning in 2008, dedicated support services have been provided that segmented support services by Ashford's military, graduate, and College of Education populations. In essence, the 2012 changes further segmented and aligned the undergraduate student population to the remaining program families, including the College of Business and Professional Studies; the College of Health, Human Services, and Science; and the College of Liberal Arts.

Student Advisors and leadership personnel work with the Executive Deans and faculty members within their assigned population segment or College, facilitating opportunities to provide cross-functional training and communication related to University policies and procedures, academic programs, and student support resources. This alignment also paves the way for better, more continuous, and more fluid communication between the academic and student support groups

with regard to student feedback both inside and outside the classroom setting. This feedback, in turn, provides information that can be used to further inform our continuous improvement process and cycle.

In addition to the revised advising model described in this section, additional initiatives related to the University's plan to improve student access to and the quality and consistency of academic and financial support and advisement services are outlined throughout this document. Please refer especially to the sections regarding attrition, support for student achievement, and adequate levels of degree completion and alignment of resource allocations with educational purposes and objectives in **Table 1**.

The Ashford University administration looks forward to sustaining dialogue with the Commission and is committed to ever-increasing levels of transparency, service to our students, and the continuous advancement of our mission.

CONCLUSION:

The Commission has asked Ashford University to respond to several concerns, some of which stem from the denial by WASC of the University's application for initial accreditation. Ashford has endeavored in this response to address the concerns raised by providing a concise overview in tabular format of the actions it has taken with regard to the WASC concerns, and has provided the documentation requested by the HLC on the University's compliance with the HLC Criteria, Core Components, and Minimum Expectations.

Several other requests by the Commission for information and documentation are relevant to admissions, financial aid, and the availability of textbooks. In each case, Ashford has submitted a complete explanation, including the current state and future plans for improvement, as well as supporting documentation relevant to the Commission's request.

The Commission further requested an update on the University's plan to improve student access to and the quality and consistency of academic and financial support and advisement services to students. Ashford has included a response and referencing supporting documentation that it hopes will provide the Commission with an appropriate level of assurance that Ashford University is taking these concerns very seriously.

In conclusion, Ashford University respects the Commission's concerns, has made a good faith effort to respond to those concerns in this document, and will be glad to provide further information relevant to the Commission's requests as necessary.